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6  
7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE DISTRICT OF ARIZONA

9 United States of America,  
10 Plaintiff,  
11 vs.  
12 James B. Panther,  
13 Defendant.

NO. CR-19-00448-PHX-DLR-2  
**MOTION TO CONTINUE TRIAL**  
**(FIRST REQUEST)**

14  
15 Defendant, through undersigned counsel of record, hereby moves this Court to enter  
16 an Order continuing the current trial date of September 3, 2019 for a period of  
17 approximately ninety (90) days based upon grounds set forth herein.

18 This case concerns a multi-defendant securities conspiracy case whose allegations  
19 involve multiple districts and international activity. Discovery is not yet complete, and it  
20 is anticipated that the forthcoming materials will be voluminous, such that substantial time  
21 is needed for the effective preparation of a defense and to prepare for trial.

22 Tracee Plowell, Assistant Chief of the Fraud Section for the United States  
23 Department of Justice, has authorized the undersigned to convey to the Court that she has  
24 no objection to the instant request.

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1 It is expected that excludable delay under 18 U.S.C. §3161(h)(7) will occur as a  
2 result of the Court's granting of this request or an Order based thereon.

3 RESPECTFULLY SUBMITTED this 29th day of July, 2019.

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5 BALLARD SPAHR LLP

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7 By: /s/ Mark Kokanovich  
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12 Attorneys for Defendant James B. Panther  
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**CERTIFICATE OF SERVICE**

I certify that on the 29th day of July, 2019, I electronically transmitted a PDF version of this document to the Office of the Clerk of the Court, using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all CM/ECF registrants listed for this matter.

By: /s/ Sarah Gennett

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